

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V (draft permit) No. V-00-005 (Revision 1)

INOAC Packaging Group

Bardstown, KY.

May 10, 2002

SAJJAD QUABILI, REVIEWER

Plant I.D. 21-179-00040

Application Log # 54386

SOURCE DESCRIPTION:

IONAC Packaging Group produces plastic cosmetic bottles from plastic resins using an injection blow molding process. Some of the bottles are silkscreen printed or hot stamped with a label while some bottles are coated with spray coating in mini-froster. The company wants to add nine additional presses in the molding operation to the existing facility.

COMMENTS:

INOAC is currently holding a Title V permit (V-00-005). The addition of the six mini-froster presses to the facility triggered significant revision of the Title V permit. PM, VOC and HAPs emissions were calculated for the presses using material balance with information and material safety data sheets from the company. The remaining three silk screens are classified as insignificant activities.

Spray booths are equipped with cartridge filters to control particulate emissions. The efficiency of the cartridge filter was assumed to be 97%. No control equipment is equipped for the VOC or HAP emissions.

Mini-froster presses will be added to the facility by phases. Two mini-froster presses will be added in 2002. Two more mini-froster presses are projected to add to the facility in the year 2004 and finally two more mini-frosters are projected to add to the facility in the year 2006.

EMISSION AND OPERATING CAPS DESCRIPTION:

The source was title V for VOC and HAP emissions. An emissions cap of 9.0 tpy for a single HAP and 22.5 tpy for total HAPs are required to preclude case by case MACT review for the construction of the 6 mini-frosters (EP#7 through 12). The source requested voluntary permit limit of volatile organic compound emissions less than 90 tons per year to preclude 401 KAR 50:012. There is no emission limit for particulate since the potential to emit is below regulatory limitations. Particulate matter from the affected facilities is limited to 2.34 lbs./hr each and visible emissions shall not equal or exceed 20% opacity.

OPERATIONAL FLEXIBILITY:

Operational flexibility will be restricted such that it meets the criteria of the emission and operating caps as described above.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.